## Federal Defenders OF NEW YORK, INC.

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November 13, 2024

## **BY EMAIL & ECF**

Hon. P. Kevin Castel United States Magistrate Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re:

United States v. Jason Bell

24 Cr. 526 (PKC)

Application Granted.

So Ordered:

Hon. P. Kevin Castel, U.S.D.J.

Dear Judge Castel:

I write, as counsel to Jason Bell in the above-captioned matter, to respectfully request a temporary modification of Mr. Bell's bail conditions to allow him to celebrate his anniversary with his partner at a restaurant in Manhattan on November 23, 2024 from 6:00 to 10:00 pm at a location to be provided to pretrial services, instead of November 19, 2024 as previously granted by the Court. Dkt. 17.

On October 22, 2024, Mr. Bell requested modifications to his bail conditions, including that he be permitted to go out to dinner with his partner on November 19, 2024. On November 4, 2024, the Court granted Mr. Bell's requests. *Id.* Shortly thereafter, Mr. Bell asked his pretrial services officer if he could go out to dinner on November 23 instead of November 19. Because the Court had granted the request for November 19, pretrial services informed Mr. Bell that he must seek permission from the Court to change the date.

Accordingly, Mr. Bell respectfully requests a temporary bail modification to allow him to celebrate his anniversary with his partner at a restaurant in Manhattan on November 23, 2024 from 6:00 to 10:00 pm at a location to be provided to pretrial services, instead of November 19, 2024 as previously granted by the Court. *Id*.

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Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

Counsel for Jason Bell

cc: Counsel of record